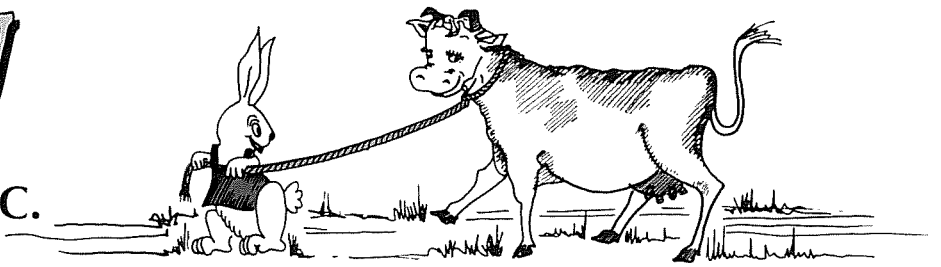
Central Valley
MEAT CO., INC.



December 22, 2007

VIA E-MAIL Kcarpenter@waterboards.ca.gov, FAX 445-5910 & Fed Ex

Douglas K. Patteson, P.E.
CA Regional Water Quality Control Board
1685 E Street
Fresno, Ca 93706-2020

Re: Tentative Waste Discharge Requirements for the Central Valley Meat

After reviewing the Tentative Waste Discharge Requirements for the Central Valley Meat Company, Hanford Beef Processing Facility I am submitting the enclosed comments on behalf of Central Valley Meat Company. The enclosed comments have cooperatively been prepared by Donald Ikemiya of Provost & Pritchard Engineering Group, Ken Schmidt of Ken Schmidt & Associates Groundwater Quality Consultants and Brian Coelho of Central Valley Meat.

Very truly yours,

Brian Coelho
Central Valley Meat

Enclosure:
Provost & Pritchard Memo
Ken Schmidt Memo
Water Balance Data
Parcel Location Map

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MEMORANDUM

To: Brian Coelho

From: Donald Ikemiya, P.E. DI

Subject: Central Valley Meat Company - Review of Tentative WDRs

Date: 12/21/07

General Comments

- The attached Parcel Location Map shows the existing parcels with APN acreage. More land is needed because of the nitrogen loading on 186 acres. It is recommended that this additional land be included into the WDR permit. Please note that the owners of the 186 acre reclamation area are Brian Coelho, Steve Coelho and Ronnie Coelho. It is not owned directly by the discharger. The parcels to be added are summarized below and are also shown on the map.

APN	APN Land Application Area	Owner	Notes
016-060-041	47.74 ac	Lawrence and Shirley Coelho	Joint discharger
016-130-055	84.29 ac	Tri West Investments LLC,	Owned by Brian, Steve and Ronnie Coelho
016-130-058	78.48 ac	Daniel J. Leal	Wastewater Agreement to be secured

- A preliminary updated water balance was prepared with hydraulic, nitrogen, and salt loading calculations. The volumes are based on the Pond 3 effluent 2003-2006 values for BOD, total nitrogen and IDS/FTDS. This analysis is conservative since it does not include the 1.4x to 1.65x factor allowed in nutrient management plans. **Recommend requesting that with the additional lands added to the permit, the hydraulic loading permit limit be raised from 370,000 gpd to 420,000 gpd and retain the ability to increase the flowrate to an unspecified amount in the future.**
- **Pond improvements should not be required to increase the future flowrate** because land application loading is not a direct line correlation with pond storage capacity.
- #13 - States that "a sump in the covered holding pen area discharges to the Central Sump without any pretreatment." This is incorrect, this sump pumps water over a "SWECO" screen and then to the Central Sump.

- #43 – Last sentence is speculative. "Overloading…" **Request that it be deleted.**
- B1 - Limits – Change to **420,000 gpd monthly average**. Change the maximum amount to a value to be specified with a technical report but not tied to pond improvements.
- B2 - Limits – The FDS limit of 500 mg/L into the ponds on a monthly basis is low. Based on the FDS land loading rates, the land application area could handle a limit of as much as 950 mg/L and still meet loading limits. The current FDS sample concentrations can also exceed this 500 mg/L limit. **Recommend requesting it be raised to a conservative 850 mg/L.** It also needs to be changed in the Information Sheet pg 5.
- F1 – Groundwater Limits – The intent of why these limits are listed should be clarified (drinking water standards, source groundwater, monitoring wells?). **Recommend requesting that this section be taken out due to its confusing and redundant nature.**
- G11 – Pond Improvements – **Request that the word "deepen" be taken out.** Beginning construction of pond improvements within 90 days of approval of the Design Plan is unrealistic due to the likelihood that construction would end up starting during the rainy season. The ability to empty, dry out and work in the ponds should occur after the rainy season. **Request the 90 day and all the compliance dates be taken out. A schedule can be prepared as part of the Design Plan.**
- G12 – 25 Acres Soil Investigation – Since there is no intent of bringing this area into the irrigated reuse area then the investigation should not be required.
- G13 – Take out "former land application area".

Monitoring & Reporting Program

Pond Influent – Discharge Monitoring

- Approximately 5 years of monthly data has been collected for IDS and values are relatively consistent with no upward trends. **Recommend requesting EC and Inorganic TDS remain at monthly sampling frequencies not 2/Month.**
- Currently the composite sampler is based on time intervals. The composite sampler was replaced recently and a determination on the feasibility of taking volumetric samples can be made but not required. Replacing a new sampler ($5,000+) for purposes of taking volumetric samples would be costly. **Recommend requesting the sampling remain as before and volumetric sampling not be required.**

Pond Effluent – Discharge Monitoring

- Approximately 5 years of monthly data has been collected for EC and IDS and values are relatively consistent. **Recommend requesting EC and Inorganic TDS remain at monthly sampling frequencies not 2/Month.**

Use Area Monitoring

- Request A.1. "use area monitoring" be taken out. It is quarterly and is listed again in the Quarterly Reports.

Reporting

- **Pg 8, Item #3 – Groundwater:** Consistent with the recommendations by Ken Schmidt for semi-annual groundwater monitoring, this item should be changed to read "Monitoring analytical data obtained semi-annually is to be presented in tabular form for selected constituents and included with the previous data obtained for the given well."
- **Annual Reports should be due on 1 March rather than 1 February.** More time is needed to compile, analyze and prepare the report.
- For solids reporting a single test for dry tons and percent solids can be done and a correlation between loads and truck weights can be made. Then truck loads can be counted and totaled. Every load should not have to be weighed.

Information Sheet

Groundwater Conditions

- On page 2 of the information sheet paragraph #2, first sentence. The word "significantly" should be deleted and replaced with "on a geographical basis"

MEMO

To: Brian Coelho, Central Valley Meat

From: Ken Schmidt

Date: December 11, 2007

Topic: Tentative WDR of 11/17/07

Following are my comments on the groundwater aspects of the Tentative WDR.

Groundwater Conditions (Item No. 40)

The comment about "background quality of shallow groundwater in the area is generally good" should be revised. This is because arsenic wasn't considered. Water from MW-8 had 31 ppb of arsenic and water from Well No. 10 had 381 ppb of arsenic on July 18, 2007 (KDSA quarterly report of September 7, 2007). These concentrations greatly exceeded the MCL of 10 ppb, and render the background shallow groundwater in the area of unsuitable quality for drinking water.

Antidegradation Analysis (Item No. 53)

It should be added that the background shallow groundwater arsenic concentrations greatly exceeded the MCL. This supports the statement in Item No. 53.

Groundwater Monitoring

Groundwater monitoring at the plant started in 1991. We have prepared a number of reports on the results of monitoring for many years. Water-level hydrographs and water-level elevation and direction of groundwater flow maps indicate relatively slow changes and consistent patterns. Tabulations of concentrations of specific constituents of concern are updated in quarterly reports. Hydrographs for these constituents have also been provided annually. All of this information indicates that semi-annual (twice a year) monitoring of the groundwater would be adequate. Thus quarterly monitoring is no longer necessary.

The following constituents need to be determined only annually: ammonia, TKN, total nitrogen, iron, and manganese. This is because concentrations have been low, except for total nitrogen. Total nitrogen essentially reflects nitrate concentrations (nitrate would continue to be determined semi-annually).

For reporting purposes (page 7), the groundwater monitoring results would be reported semi-annually. On page 8, item 2, the historical graphs would be provided in annual reports.